Department of Defense (DoD)

Civilian Personnel Management Service (CPMS) Field Advisory Services - **FAS**Classification Appeal Decision

DoD Decision:	(Title to be determined by Agency), GS-0303-07
Initial classification:	Credentials Technician, GS-0303-07
Organization:	Naval Hospital Credentials Coordinator
Date:	April 2, 1997

INFORMATION CONSIDERED

This appeal decision is based on information from the following sources:

- 1. The appellant's letter of, appealing the classification of his position.
- 2. Official position description for appealed position, number, and evaluation statement.
- 3. Statement of job description accuracy signed by appellant and supervisor.
- 4. Organizational charts and mission statement pertaining to the appealed position
- 5. Appellant's performance standards.
- 6. Telephone interview with supervisor and audit with appellant conducted on.

STANDARDS REFERENCED

A. United States Office of Personnel Management, Miscellaneous Clerk and Assistant Series, GS-303, January 1979.

B. United States Office of Personnel Management, Grade Evaluation Guide for Clerical and

Assistance Work, June 1989.

C. United States Office of Personnel Management, Health Specialist Series, GS-0671, December 1979.

D. Introduction to the Position Classification Standards, August 1991.

BACKGROUND AND POSITION INFORMATION

The appellant disagrees with his agency's classification determination of the title, series, and grade of his position. He believes that the current classification, Credentials Technician, GS-303-7, does not accurately reflect his duties and responsibilities as the "Credentials Coordinator" for the Hospital, and branch medical clinics. The appellant believes that in comparison to Credentials Coordinators at other Medical Treatment Facilities, his grade is too low and his position is comparable to the Health System Specialist Series, GS-671.

The appellant's duties and responsibilities are described in position description number, classified on . The position is assigned to the Hospital, and is primarily responsible for coordinating all technical and administrative matters pertaining to the credentialing/privileging of healthcare providers. Also, in this capacity, position functions as "Professional Affairs Coordinator" and "Special Assistant to the Executive Officer". Position verifies the medical education of practitioners requesting hospital privileges and ensures the application of all pertinent established policies, procedures and criteria that apply to the credentialing process.

Appellant performs the following: reviews, recommends and implements procedural policies for all privileging situations; reviews all recommendations of inspecting bodies (i.e., Joint Commission for Accreditation of Healthcare Organizations (JCAHO), Inspector General of the Navy (IG), Bureau of Medicine and Surgery (BUMED), etc.) and designs system solutions (procedures) for implementation; ensures validation of all background information used in verifying providers' medical qualifications prior to employment; researches and prepares responses to inquiries from other institutions concerning the work or training performance of current and previous medical staff members; recommends, reviews, revises, interprets and implements local instructions and forms pertaining to privileging procedures; compiles required information and prepares pertinent reports; maintains proper documentation; and provides technical advice and training on all privileging requirements and procedures.

Both the supervisor and appellant signed a statement certifying that the position description

had been reviewed and accurately reflects the duties and responsibilities of the subject position.

TITLE AND SERIES DETERMINATION

The activity classified the appellant's position as GS-303, Miscellaneous Clerk and Assistant Series. We concur with the activity's assessment. The appellant believes that his position is comparable to positions located at other Medical Treatment Facilities. A job description cover sheet for a GS-671-9/11, Health System Specialist, and vacancy announcement for a GS-671-11 position, both from the Naval Hospital in , were included in the appellant's appeal package. Before, proceeding, it should be noted that classification appeal decisions can not be based on comparison to other positions which may or may not have been correctly classified and/or which may have had other duties and responsibilities on which the overall grade was based.

We find that the appellant performs duties that are technical in nature. Clear cut and defined procedures and instructions combined with the paramount need to oversee all administrative aspects preclude this position from being placed within the Health System Specialist Series, GS-671 (Reference C). This series is responsible for providing "support to health care management officials by analyzing, evaluating, advising on and/or coordinating health care delivery systems and operations. ... In addition to a high degree of analytical ability, positions in this series require specialized knowledge of the basic principles and practices related to the management of health care delivery systems." Position does not meet either the intent or requirements of the GS-671 series.

While some technical work at the higher grade levels may appear similar to that performed by employees doing beginning level professional or administrative work, technical work does not require the in-depth and extensive knowledge and application of the qualitative and quantitative methods and management theories of these occupations. Assistant or technician work requires knowledges of the methods and procedures that are part of, or subordinate to, an administrative or program area. The appellant oversees the procedural and administrative processes of the Credentialing/Privileging Program by certifying compliance in accordance with instructions and regulations that are promulgated by higher authorities (i.e., JCAHO, IG, and BUMED). The appellant provides technical advice and assistance and in no way has final program authority to make or adjudicate final command privileging decisions that are clearly made by management and higher authorities. Therefore, position does not meet the series definition for the Health Systems Specialist Series that can not be considered for this position.

Position performs technical, assistant and clerical duties that involve specialized work for which no appropriate occupational series has been established and best meets the series definition and coverage under the Miscellaneous Clerk and Assistant Series, GS-303. The primary purpose of this position, which represents 40% of the appellant's time, is to implement pertinent instructions/guidelines and ensure for the documentation, compliance, and completion of the credentialing/privileging process. No titles are specified for positions in this series. In constructing a title, the activity should follow the titling guidance that is explained in both the Introduction to the Position Classification Standards and the GS-303 standard. The position is appropriately classified as (Title Optional), GS-303.

GRADE LEVEL DETERMINATION

The GS-303 standard does not contain grading criteria and specifies the use of the Grade Evaluation Guide for Clerical and Assistance Work (Reference B) for grading. This guide provides general criteria for use in determining the grade level of non-supervisory clerical and assistance work from GS-1 through GS-7. Administrative support work of the kind described in this guide is performed in offices, shops, laboratories, hospitals, and numerous other settings in all Federal agencies.

The guide describes the general characteristics of each grade level from GS-1 through GS-7 in a three-part format:

- 1. The definition of the grade level as spelled out the law (5 U.S.C.);
- 2. A description of the grade level concept pertaining to clerical and assistance work written in narrative format in terms of two evaluation factors: Nature of Assignment and Level of Responsibility; and
- 3. General work examples to illustrate each grade level. All criteria must be considered to determine the appropriate grade of a position.

The Law

The appellant's responsibilities exceed the GS-6 level and are comparable to the GS-7 grade level definition under the law in which the position performs under general supervision, work is of considerable difficulty and responsibility along special technical lines in office administration; requiring considerable specialized training and experience; comprehensive working knowledge of a special and complex subject matter, procedures, or practice

(credentialing/privileging); and requires to a considerable extent the exercise of independent judgment.

Nature of Assignment

This factor measures the elements of knowledge required and complexity of work performed.

At the GS-6 level, assignments involve a relatively narrow range of case situations that occur in a broad administrative program or function. Also, assignments requiring evaluative judgment are narrowly focused, address a single product or action, and are relatively clear cut. Employee usually deals with problems or situations that remain stable, and resemble past problems or situations.

At the GS-7 level, "work consists of specialized duties with continuing responsibility for projects, questions, or problems that arise within an area of a program or functional specialty as defined by management. Work assignments involve a wide variety of problems or situations common to the segment of the program or function for which the employee is responsible. Each assignment typically consists of a series of related actions or decisions prior to final completion. Decisions or recommendations are based on the development and evaluation of information that comes from various sources. The work involves identifying and studying factors or conditions and determining their interrelationships as appropriate to the defined area of work. The employee must be concerned about taking or recommending actions that are consistent with the objectives and requirements of the program or functions. The work requires knowledge and skill to recognize the dimensions of the problems involved, collect the necessary information, establish the facts, and take or recommend action based upon application or interpretation of established guidelines. The work also requires practical knowledge, developed through increasingly difficult, on-the-job training or experience dealing with the operations, regulations, principles, and peculiarities of the assigned program, function, or activity".

Position exceeds the GS-6 level and is a match to the preceding GS-7 grade level definition for nature of assignment. The standard's illustrative work example also supports this grade level determination. The types of examples cited directly correlate with the position in terms of advising management, making recommendations, and ensuring compliance on the practical and technical aspects of the credentialing/privileging requirements, formats, and procedures; compiling/tracking required information, preparing reports and maintaining proper documentation; and possessing a broad understanding and detailed procedural knowledge of the credentialing/privileging process.

Based on the above, Nature of Assignment is evaluated at the GS-7 level.

Level of Responsibility

This factor measures the supervisory controls over the work, nature of guidelines used, and the personal contacts made in performing the duties.

At the GS-6 level, the supervisor assists employee with precedent assignments by providing an interpretation of policies and evaluating work for appropriateness and effectiveness in meeting goals. Varied guidelines are adapted and applied. The employee contacts others to provide, receive or develop information in order to identify problems, needs or issues and/or coordinate work efforts and/or resolve problems. Position exceeds the GS-6 level.

Work at the GS-7 level is assigned in terms of objectives, priorities, and deadlines. While the employee works independently in resolving most conflicts, completed work is evaluated for technical accuracy, soundness of judgment, and adherence to program requirements and objectives. Guidelines, such as regulations, precedent cases and policy statements require considerable interpretation and adaptation that require the employee to apply general principles to specific situations. Contacts are with all levels both inside and outside the organization with the purpose of exchanging information, resolving operating problems, and making recommendations.

Corresponding to the GS-7 level, appellant receives general guidance regarding the scope of assignments and results expected. Work is performed independently in conjunction with a large number of guidelines that are complex and cover the various aspects of the total job. Guidelines apply less to specific actions and more to the operational characteristics and procedural requirements of the credentialing/privileging function. Appellant must use significant judgment and interpretation to apply guides to specific cases and adapt or improvise procedures with coordination to accommodate unusual or one-of-a-kind situations. The contacts and purpose of contacts are similar to the GS-6 level. However, to a greater degree, at the GS-7 level the incumbent serves as a central point of contact to provide authoritative technical explanations to the decision makers (management) on the requirements, regulations, and procedures of the credentialing/privileging process.

Position equates to the GS-7 Level of Responsibility.

Both the above factors are evaluated at the highest grade level of this standard, GS-7. The duties and responsibilities of this position meet the GS-7 level with both the definition of the GS-7 level work in the Law and GS-7 work example in the standard. The position is

appropriately classified at the GS-7 level.

DECISION

The appealed position is properly classified as GS-303-7 with the title to be determined locally. This decision constitutes a classification certificate that is binding on all administrative, certifying, payroll, disbursing, and accounting offices within the Department of Defense.